

November 17, 1999

Ms. Magalie Roman Salas, Secretary Federal Communications Commission The Portals, TW-A325 445 12th Street, S.W. Washington, D.C. 20554

Re: Ex Parte Notification – WT Docket No. 99-168

Dear Ms. Salas:

On November 16, 1999, Motorola representatives Merle Gilmore, Mike Kennedy and Rich Barth met with Commissioner Susan Ness and her legal advisor Mark Schneider.

Motorola presented its band plan for spectrum at 746-806 MHz (see attachment) and advocated for an allocation to PMRS of 6 MHz of spectrum and an allocation to CMRS of 30 MHz of spectrum. Motorola highlighted its views that:

- Public Safety spectrum in this band required protection from interference.
- PMRS has a long history of protecting public safety from interference via frequency coordination.
- There are economies of scale that accrue to public safety by having nearly identical technologies in the adjacent spectrum; and
- The 2 x 15 MHz of spectrum for CMRS use is optimal for a variety of services.

Motorola indicated that there is not yet industry consensus on how to allocate the 2 x 15 MHz CMRS blocks of spectrum, but that it is actively seeking such consensus.

Sincerely,

Richard C. Barth, Ph.D.

Vice President and Director, Telecommunications Strategy and Regulation Motorola, Inc.

Attachment

C: Mark Schneider

TV Ch. 59 WE CIRS W

- 6 MHz allocated for private (PMRS), in two blocks of 1.5 + 1.5 MHz
- 30 MHz for Commercial Carriers (CMRS); 15+15 MHz.
- 24 MHz for public safety (allocation completed)